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August 15, 2006

By UPS overnight mail

Vernon A. Williams, Secretary
Surface Transportation Board
Case Control Unit, Suite 713
1925 K Street, N.W.
Washington, DC 20423-0001

ENTERED
Office of Proceedings
AUG 15 2006
Part of
Public Record

Re: Finance Docket No. 34917, *Pioneer Industrial Railway Co. -- Alternative Rail Service -- Central Illinois Railroad Company*

Dear Mr. Williams:

Enclosed please find an original and 10 copies of Motion For Leave To Supplement The Record With Rehabilitation Cost Estimate, for filing with the Board in the above referenced matter.

Very truly yours,

Tom McFarland

Thomas F. McFarland
Attorney for Respondents

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BEFORE THE
SURFACE TRANSPORTATION BOARD



PIONEER INDUSTRIAL RAILWAY CO.)
-- ALTERNATIVE RAIL SERVICE --) FINANCE DOCKET
CENTRAL ILLINOIS RAILROAD) NO. 34917
COMPANY)

**MOTION FOR LEAVE TO SUPPLEMENT THE
RECORD WITH REHABILITATION COST ESTIMATE**

CITY OF PEORIA, ILLINOIS
CITY HALL
419 Fulton Street
Peoria, IL 61602

CENTRAL ILLINOIS RAILROAD COMPANY
P.O. Box 259
Granville, IL 61326

VILLAGE OF PEORIA HEIGHTS, ILLINOIS
VILLAGE HALL
4901 North Prospect Rd.
Peoria Heights, IL 61616

Respondents

THOMAS F. McFARLAND
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208 South LaSalle Street, Suite 1890
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Attorney for Respondents

DATE FILED: August 16, 2006

BEFORE THE
SURFACE TRANSPORTATION BOARD

PIONEER INDUSTRIAL RAILWAY CO.)	
-- ALTERNATIVE RAIL SERVICE --)	FINANCE DOCKET
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COMPANY)	

**MOTION FOR LEAVE TO SUPPLEMENT THE
RECORD WITH REHABILITATION COST ESTIMATE**

Pursuant to 49 C.F.R. § 1117.1, CENTRAL ILLINOIS RAILROAD COMPANY (CIRY), THE CITY OF PEORIA, ILLINOIS and THE VILLAGE OF PEORIA HEIGHTS, ILLINOIS (the Cities) hereby move for leave to supplement the record by filing the rehabilitation cost estimate that is attached to this Motion as Appendix 1.

In their “Reply in Opposition to Petition to Provide Alternative Rail Service” filed on August 3, 2006, CIRY and the Cities provided an estimate of the track rehabilitation work required on the Kellar Branch between Adams Street and Pioneer Parkway in order to provide safe rail operations. (Appendix 1). A detailed estimate of the cost of that rehabilitation was not available to CIRY and the Cities at that time. At page 4 of that Reply, CIRY and the Cities estimated that the cost of such rehabilitation would be \$500,000. However, that estimate mistakenly appeared as \$50,000 in the Reply.

On August 4, 2006, Central Railgroup Construction Services, LLC provided a more detailed estimate of the cost of that rehabilitation in the amount of \$546,705. That estimate is attached as Appendix 1.

The Board should accept that estimate of rehabilitation cost into the record in the interest of having a complete and accurate record.

Respectfully submitted,

CITY OF PEORIA, ILLINOIS
CITY HALL
419 Fulton Street
Peoria, IL 61602

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P.O. Box 259
Granville, IL 61326

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DATE FILED: August 16, 2006

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Granville, Illinois 61326-0259

Telephone: (815) 339-6839

Fax: (815) 339-6400

ESTIMATE FOR TRACK REPAIR

Kellar Branch - Pioneer Parkway to Adams Street

August 4, 2006

Central Railgroup Construction Services, LLC used the noted FRA defects listed below to estimate your costs to repair the track that runs from Pioneer Parkway to Adams Street. We caution that the listed defects are for this one inspection only and any future inspections would possibly incur additional repairs and costs. Central Railgroup Construction Services in no way warranty this track to be in FRA Class I compliance once this work is completed. This quote was calculated using the August 2006 Illinois Prevailing Wage Rates.

DEFECTS NOTED:

- Track out of gage
- Cross ties needing replacement -- approximately 1750 (this would replace 5 ties within each 39 foot occurrence plus ties for the joints for each occurrence)
- Track overgrown with vegetation -- from Pioneer Parkway to Adams Street. This vegetation to be cut and sprayed to control growth.
- Removal small trees that are too close to track
- Raise and tamp track due to low spots or improper cross level. Furnish and install track ballast for low spots, cross level problems and replace shoulder rock
- Repair broken rails
- Repair wash outs and severe slopes
- Numerous miscellaneous repairs such as replace broken joint bars and track bolts, install missing bolts, tighten loose nuts, drill holes in rail

We estimate that it will cost City of Peoria \$546,705.00 to repair those items listed above that would correct the FRA defects.

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2006, I served the foregoing document, Motion For Leave To Supplement The Record With Rehabilitation Cost Estimate, by UPS overnight mail, on the following:

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